

**Exhibit 17**  
In Support of  
Non-Party Meta Platforms, Inc.’s  
Motion for Protective Order

**From:** Moorthy, Neelesh <[nmoorthy@axinn.com](mailto:nmoorthy@axinn.com)>

**Sent:** Wednesday, June 5, 2024 7:47 PM

**To:** Fitch, Jackie <[JFitch@cov.com](mailto:JFitch@cov.com)>; Patchen, Kate <[KPatchen@cov.com](mailto:KPatchen@cov.com)>

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**Subject:** RE: Meta Subpoena | State of Texas et al. v. Google LLC, No. 4:20-CV-00957-SDJ (E.D. Tex.)

**[EXTERNAL]**

Hi Jackie,

Pursuant to Paragraph 25 of the Modified Protective Order entered as docket entry 203 in *United States v. Google LLC*, No. 1:23-cv-00108 (E.D. Va.) (the "Virginia Action") (the "Confidentiality Order"), Google writes to notify Meta of an order ("Order") entered in *State of Texas v. Google LLC*, No. 4:20-cv-00957 (E.D. Tex.) ("Texas Action"), attached hereto.

The Order compels Google to produce in the Texas Action any materials produced by and deposition testimony of Meta in the Virginia Action and in the DOJ's related pre-suit investigation of Google's display ads business (collectively, the "Materials").

Under the Order, to the extent any of the Materials were designated by Meta as "Confidential" or "Highly Confidential" under the Confidentiality Order, they will be treated as "Confidential" or "Highly Confidential," as designated, under the confidentiality order governing the Texas Action, entered as docket entry 182 in the Texas Action and attached hereto as well.

The Order also provides that, if Meta "wishes to object to the reproduction of its Materials" in the Texas Action, it "shall seek a protective order from [the U.S. District Court for the Eastern District of Texas] within seven days of Google's service of th[e] Order on" Meta.

The Order requires no further document production from Meta.

We are available to discuss the Order and any questions you may have.

Best regards,  
Neel

**Neelesh Moorthy**  
**Associate**



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Pronouns | He, Him, His